

United States District Court Western District of Arkansas

**Jonathan Daniel Clements,
Plaintiff**

v.

**Sebastian County Sheriff's Department,
Judge Wagoner, Judge Stephen Tabor,
Defendants**

Case No: _____

COMPLAINT UNDER 42 U.S.C. § 1983

Plaintiff Jonathan Daniel Clements respectfully submits this Complaint against the above-named Defendants for violations of his constitutional and civil rights under the laws of the United States.

I. JURISDICTION & VENUE

This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343. Venue is proper in this District under 28 U.S.C. § 1391(b) because the events giving rise to these claims occurred within the Western District of Arkansas.

II. PARTIES

Plaintiff: Jonathan Daniel Clements, a private individual and ordained minister, residing in Arkansas.

Defendants:

1. Sebastian County Sheriff's Department - Law enforcement agency overseeing operations in Boonville/Fort Smith region.
2. Judge Wagoner - Arkansas District Judge alleged to have unlawfully tampered with court documents.
3. Judge Stephen Tabor - Arkansas Circuit Judge alleged to have participated in misconduct or failed oversight.

III. FACTUAL ALLEGATIONS

1. Plaintiff lawfully lodged a multi-jurisdictional ecclesiastical trust (ECC-TRUST-JDC-005), including over 1700 declarations, into the Greenwood District Court. The filing was notarized and received with an official court stamp.
2. Judge Wagoner allegedly scribbled out court-accepted stamps and unlawfully removed validly filed documents from the case file.
3. Plaintiff has been followed, harassed, and unlawfully detained by deputies acting outside their lawful authority.
4. Plaintiff's trust-registered vehicle was towed despite legal documentation, resulting in stacked citations without commercial cause.
5. Plaintiff has faced repeated threats against his life and family, warranting protective action, all of which were ignored by law enforcement.
6. Despite seeking sanctuary through a hospital and undergoing mental health evaluation, Plaintiff was not provided any form of federal or local protection.

IV. CLAIMS FOR RELIEF

Claim 1: Violation of First Amendment Rights – Retaliation for religious and political expression.

Claim 2: Violation of Fourteenth Amendment – Denial of due process and equal protection under the law.

Claim 3: Violation of 42 U.S.C. § 1983 – Deprivation of rights under color of law.

Claim 4: Fraud Upon the Court – Unlawful removal and alteration of lodged legal documents.

V. REQUEST FOR RELIEF

Plaintiff respectfully requests the following relief:

1. Immediate federal investigation into the actions of the above-named Defendants.
2. Transfer of all related matters into federal jurisdiction.
3. Injunctive relief halting further harassment and retaliation.
4. Protective order shielding Plaintiff and his named family members.
5. Recognition of the validity of ECC-TRUST-JDC-005 and associated legal documents.
6. Any other relief deemed appropriate by this Court.

Respectfully submitted,

Jonathan Daniel Clements

Date: _____